



United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

March 10, 2022

**BY ECF**

The Honorable Paul A. Crotty  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Ediberto Santana, et al.*, 20 Cr. 22 (PAC)**

Dear Judge Crotty:

The Government respectfully submits this letter having conferred with counsel to defendants Ediberto Santana and Carlos Ramirez (the "Defendants"). The Parties have been informed that trial in this matter has been set for May 25, 2022. Counsel for the Defendants have informed the Government that they wish to seek an adjournment of the trial date to December 2022. Counsel for the Defendants have provided the following justification for their request: "The Defendants have been in lockdown in one form or another for over two years, with a full facility lockdown from December 2021 until February 2022 in response to the Omicron surge. Our ability to meet with our clients to discuss the evidence, trial strategy and potential settlement has been consistently upended by the admittedly necessary MDC lockdowns, as well as continuing visitation issues for counsel who are caregivers. We request this change of trial date so counsel can consistently meet with our clients to responsibly prepare for trial and have productive discussions regarding potential resolutions."

Without adopting Defense counsel's description of events, the Government consents to an adjournment of trial. The Government takes no position on the Defendants' request for a December 2022 date, except that the Government would oppose an adjournment beyond December 2022. The Government could proceed with trial before December 2022.

In addition, all parties jointly request the following pre-trial schedule:

- Final Pretrial Conference ("FPTC"), to include resolution of motions *in limine*, four weeks before trial;
- **Motions *in limine* due six weeks before the FPTC;**

- Paul A. Little